

**UNITED STATES BANKRUPTCY COURT
FOR THE
DISTRICT OF VERMONT**

IN RE:

**Hermitage Inn Real Estate
Holding Company, LLC.
Putative Debtor**

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**Involuntary Chapter 7
Case No.: 19-10214 CAB**

**MOTION TO ALLOW ADMISSION PRO HAC VICE OF PAUL F. O'DONNELL, ESQ.,
CO-COUNSEL TO BERKSHIRE BANK**

NOW COMES Elizabeth A. Glynn, Esq., attorney and counselor at law admitted to practice and in good standing in this Court, and respectfully moves this Court for entry of an order, pursuant to Rule 83.1(b) of the Local Rules of the United States District Court for the District of Vermont (the "District Court Local Rules") and Rule 2090-1(b) of the Vermont Local Bankruptcy Rules (the "Local Bankruptcy Rules"), (i) admitting **PAUL F. O'DONNELL, ESQ.** (the "Admittee") pro hac vice to also represent Berkshire Bank in this case; (ii) authorizing the registration of the Admittee for this Court's electronic filing system; and (iii) authorizing the Admittee to rely upon the law offices of Ryan, Smith & Carbine, Ltd. to effectuate electronic filings with the Court until such time as the Admittee's registration to use this Court's electronic filing system has been processed and the Admittee is able to use such electronic filing system.

In support of this Motion, movant relies upon the affidavit (the "Affidavit") of Admittee filed concurrently herewith and respectfully represents as follows:

1. The Admittee is an attorney with the law firm of Hinckley Allen, 28 State Street, Boston MA 02109-1775.
2. Admittee has extensive experience representing parties in large chapter 11 cases. Moreover, the Admittee has represented and advised Berkshire Bank prior to the filing of the above captioned case.
3. The Admittee has associated with the law offices of Ryan, Smith & Carbine, Ltd. in this case pursuant to District Court Local Rule 83.1(b)(3) and Local Bankruptcy Rule 2090-1(b)(3).

4. This Motion is served upon the United States Trustee, through the ECF system. No case attorney has been appointed, and so has not been served. No further service upon any other parties is required by the Bankruptcy Code, the Federal Rules of Bankruptcy Procedure, the Local Bankruptcy Rules or otherwise and Movant requests that the Court find that sufficient notice has been given under the circumstances.

5. A Certificate of Good Standing (referenced by District Court Local Rule 83.1(b)(2)(D)) is not attached, as such is not required under Local Bankruptcy Rule 2090-1(b) and as admission is sought in the short-term so that Mr. O'Donnell can begin appearing in Hearings, the first of which is set for May 30, 2019. Mr. O'Donnell is already providing his affidavit as to his good standing in his home state. Such Certificate can be supplied if necessary.

Pursuant to Vt. LBR 2090-1, for good cause shown, Elizabeth A. Glynn, Esq. requests that she be excused from attendance at all hearings with Admittee. Paul F. O'Donnell is an accomplished bankruptcy attorney with extensive experience representing parties in large chapter 11 cases and has practiced before this court before.

WHEREFORE, the Movant respectfully requests that the Court enter an order pursuant to (i) admitting Admittee pro hac vice to also represent Berkshire Bank in the case; (ii) authorizing the registration of the Admittee for this Court's electronic filing system; (iii) authorizing the Admittee to rely upon the law offices of Ryan, Smith & Carbine, Ltd. to effectuate electronic filings with the Court until such time as the Admittee's registration to use for this Court's electronic filing system has been processed and the Admittee is able to use such electronic filing system, and (iv) for Elizabeth A. Glynn, Esq. to be excused from the Local Bankruptcy Rule requiring attendance at all hearings with the Admittee.

Dated at Rutland, Vermont on May 29, 2019.

By: /s/Elizabeth A. Glynn
Elizabeth A. Glynn, Esquire
Ryan Smith & Carbine, Ltd.
P. O. Box 310
Rutland, VT 05702-0310
802 786-1065
eag@rsclaw.com

CERTIFICATE OF SERVICE

I, Elizabeth A. Glynn, Esq., hereby certify that on this date I served a true and correct copy of the Motion to Admit Paul F. O'Donnell Pro Hac Vice, filed through the ECF system, which will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF), generated in connection with these documents.

Dated at Rutland, Vermont on May 29, 2019.

By: /s/Elizabeth A. Glynn
Elizabeth A. Glynn, Esquire
Ryan Smith & Carbine, Ltd.
P. O. Box 310
Rutland, VT 05702-0310
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AFFIDAVIT OF PAUL F. O'DONNELL, ESQ.

I, Paul F. O'Donnell, Esq., being of full age and duly sworn according to the law, depose
and say:

1. My contact information is as follows:

Paul F. O'Donnell, Esq.
Hinckley, Allen & Snyder LLP
28 State Street
Boston, MA 02109-1775
Telephone: 617-378-4182
Fax: 617-378-4183
E-mail: podonnell@hinckleyallen.com

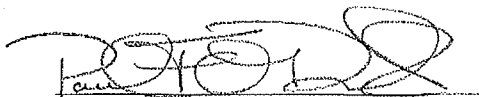
2. I am admitted to practice in the following Courts:

- (a) Commonwealth of Massachusetts, admitted on December 14, 1988, bar identification number 552456.
- (b) U.S. District Court of Massachusetts, admitted in January, 1989.

- 3. I am in good standing and eligible to practice in the courts listed above.
- 4. I am not suspended or disbarred in any jurisdiction of the court system.
- 5. I have not had nor is there any pending disciplinary action in any court against me.
- 6. I have read the District Court Local Rules and the local Rules of this Court.
- 7. I am registered to use the CM/ECF System in this District or in another district with comparable CM/ECF training and will effectuate electronic filings in this action.

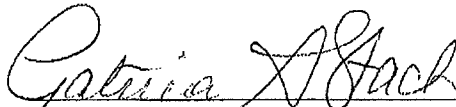
8. I designate Elizabeth A. Glynn Esq. as my agent for service of process and this Court as the forum for the resolution of any dispute arising from my pro hac vice admission.
9. I understand my obligation to file a notice with the Clerk if any fact underlying the foregoing statements change during the pendency of this case, with 14 days of such change(s) in circumstances.

DATED at Boston, Massachusetts this 28th day of May 2019.


Paul F. O'Donnell, Esq.

COMMONWEALTH OF MASSACHUSETTS
SUFFOLK COUNTY, SS

Subscribed and sworn to before me, this 28th day of May, 2019.


Notary Public
My Commission Expires:



PATRICIA A. STACK
Notary Public
Commonwealth of Massachusetts
My Commission Expires
January 27, 2023